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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all other
 similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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 (admitted *pro hac vice*)
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 Steven M. Shepard (admitted *pro hac vice*)
 Alexander Frawley (admitted *pro hac vice*)
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Case No.: 5:20-cv-03664-LHK

**DECLARATION OF ALEXANDER
 FRAWLEY IN OPPOSITION TO
 GOOGLE'S MOTION TO DISMISS
 COUNTS SIX AND SEVEN OF
 PLAINTIFFS' SECOND AMENDED
 COMPLAINT**

The Honorable Lucy H. Koh
 Courtroom 8 – 4th Floor
 Date: September 30, 2021
 Time: 1:30 p.m.

DECLARATION OF ALEXANDER FRAWLEY

I, Alexander Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey L.L.P, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York and admitted *pro hac vice* in this case (Dkt. No. 97). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Google Chrome Privacy Notice in effect since January 15, 2021, which I last accessed on June 14, 2021, on the publicly available website <https://www.google.com/chrome/privacy/>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 15th day of June, 2021, at New York, New York.

/s/ Alexander P. Frawley